

PROCEDURAL ORDER

ON THE COMPLAINT PROCEDURE IN ACCORDANCE WITH
8 OF THE SUPPLY CHAIN SUSTAINABILITY OBLIGATIONS ACT
01/2024

1. FOREWORD

Pöppelmann assumes responsibility with regard to respecting and strengthening internationally recognized human rights and compliance with environmental protection regulations, both within its own business area and within the supply chain. Pöppelmann therefore implements the necessary requirements of the German Supply Chain Due Diligence Act (LkSG) to fulfil human rights and environmental due diligence obligations. A key element in implementing the due diligence obligations under the LkSG is the establishment of an effective complaints procedure.

These rules of procedure provide information on the main features of the complaints procedure, access to the procedure and its availability as well as the responsibilities. It also provides information on what happens to incoming information and complaints, i.e. how the complaints procedure is carried out. It is important to Pöppelmann to present this information in an understandable and comprehensible way and to create the greatest possible transparency about the process. These rules of procedure are publicly accessible.

2. THE COMPLAINT PROCEDURE

The complaints procedure in accordance with Section 8 LkSG is intended to enable any person to point out human rights and environmental risks as well as violations of human rights or environmental obligations that have arisen as a result of Pöppelmann's economic activities in its own business area or those of a direct supplier. The aim is to investigate and process incoming information in a fair and transparent manner. The purpose of these rules of procedure is to explain the relevant aspects of the complaints procedure to potential whistleblowers in a transparent and comprehensible manner. This includes which risks and violations can be reported, by whom and how reports are processed and how whistleblowers are protected.

2.1 Who is the complaints procedure aimed at?

The complaints procedure in accordance with the LkSG can be used by all persons who wish to report risks and violations in the direct supply chain and in Pöppelmann's business area with regard to human rights and environmental protection. This applies regardless of whether they are employees, contractors, suppliers, customers, other companies, non-governmental organizations (NGOs) or other persons.

2.2 Who processes the complaints and reports?

The complaints and information received regarding risks and violations in the direct supply chain and in Pöppelmann's business area with regard to human rights and environmental protection are processed by a very narrow and specially trained group of selected Pöppelmann employees. It is ensured that all persons entrusted with the complaints procedure act impartially, in particular independently, are not bound by

professional instructions and are obliged to maintain confidentiality. In addition, Pöppelmann has appointed a human rights officer. The relevant contact information can be found in section 2.4.

2.3 What topics does the complaints procedure cover?

As part of the complaints procedure, complaints and information on risks and violations in the direct supply chain and in Pöppelmann's business area with regard to human rights and environmental protection can be submitted.

However, persons or groups of persons are also given the opportunity to report suspected violations of the law so that damage can be averted or minimized immediately.

2.4 How can I submit complaints or comments?

Complaints and reports can be submitted in various ways. All reports, regardless of how they are received, are processed immediately and in the same way, and we ensure that they are handled confidentially. The following channels are available to you for this purpose:

- by e-mail to: compliance@poeppelemann.com
- in writing (also anonymously) by post (Bakumer Str. 73, 49393 Lohne) or
- via the internal mailboxes
- by telephone +49 4442 982-1735 (Compliance Officer Jürgen Nordlohne) or +49 4442 982-1739 (Internal Data Protection Coordinator Nadja Kampf)
- External reporting center via ombudsstelle-poeppelemann@first-privacy.com
- Data protection: internal data protection coordinator Nadja Kampf +49 4442 982-1739 nadjakampf@poeppelemann.com; external data protection officer Peter Suhren
- (First Privacy GmbH) +49 421 696632-80 office@first-privacy.com
- All reporting channels are also publicly available on our website www.poeppelemann.com / Our responsibility / CSR management and compliance

2.5 What information should your notification contain?

So that we can process your report quickly and appropriately, it is important that it contains all the important information and is described as precisely as possible. For example, the following information may be helpful:

- **What has actually happened?**
- **When did the incident occur or how long has the incident existed?**
- **Which persons are involved in the incident?**
- **Where did the incident occur (e.g. at which location, in which country, at which supplier)?**
- **Which persons are involved in the incident and which persons are affected?**
- **Is there an immediate danger to life and limb?**

- **Have you already reported the incident elsewhere or has the incident already been reported to Pöppelmann? If yes: Have measures already been initiated to prevent the occurrence of a risk or to minimize or end an actual injury?**
- **May we contact you directly regarding your report? If yes: What type of communication do you prefer (e.g. e-mail)?**

2.6 How does the complaints procedure work?

After submitting your report, you will receive confirmation from us that we have received your complaint or report (unless you send us your report anonymously). Upon receipt of your report, we will first carefully check whether the reported facts represent a human rights or environmental risk or a violation of human rights or environmental obligations. Your report will then be forwarded to the responsible office. The next step is to clarify the facts of the case. If it is determined that a violation of human rights or environmental obligations is imminent or already taking place, preventive or remedial measures will be taken immediately. The implementation of these remedial measures is followed up by the employees involved in the complaints procedure. In addition, a proposal for further action will be drawn up based on the findings of the investigation. Once the matter has been clarified, you will receive feedback from us on the results of the investigation and the measures taken.

During the entire processing of the report, we will be in contact with you as the reporting person, if this is desired and there is a possibility of contact. This gives both you and us the opportunity to discuss the matter together. You can also express your expectations regarding possible preventive and remedial measures. These are measures that are intended to prevent the occurrence of a risk or to minimize or end an actual violation.

2.7 How are whistleblowers protected?

The protection of whistleblowers on the basis of complaints or information provided is an elementary component of the complaint's procedure. Therefore, information and complaints regarding human rights and environmental protection are only processed by a small group of specially selected and trained employees. All information, such as personal data and other information that allows conclusions to be drawn about the identity of the person providing the information, is treated confidentially. This also applies after the procedure has been completed.

2.8 How long the information is stored

In accordance with the provisions of the Supply Chain Due Diligence Act, Pöppelmann is obliged to document incoming information and to retain the documentation for seven years from the date of its creation. The retention of stored data is carried out in accordance with the applicable data protection regulations.

3. REVIEW OF THE EFFECTIVENESS OF THE COMPLAINTS PROCEDURE

The effectiveness of the procedure described in these rules of procedure is reviewed annually and on an ad hoc basis. This review takes into account the knowledge gained from the procedure as well as the experiences and expectations of our stakeholders. We also regularly review whether access is sufficiently guaranteed for the groups of people prioritized from the human rights and environmental risk analysis.